

The Honorable Richard Jones

**United States District Court
Western District Of Washington
At Seattle**

Ahmed Ali,

Plaintiff,

V.

**S2 Verify, LLC
and
BACKGROUNDCHECKS.COM, INC.,**

Defendants.

Cause No: 2:13-cv-01838

Joint Status Report

Pursuant to the Honorable Richard A. Jones' order Requiring Status Report, Plaintiff and Defendants submit this Joint Status Report and Discovery Plan as follows:

1. **Nature Of Case:** This is a case concerning allegations by plaintiff that the defendants violated the Fair Credit Reporting Act, 15 U.S.C. sections 1681 *et seq.* (“FCRA”).
Parties agree the case is not complex.
 2. **Additional Parties.** Parties agree the deadline for joining additional parties should be March 07, 2014.
 3. **Magistrate:** No.

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2 **4. Discovery Plan:**

- 3 **A. Initial Disclosures:** Defendants Backgroundchecks.com and S2 Verify filed Initial
4 Disclosures on January 13, 2014 pursuant to FRCP 26(a). Plaintiff made his Initial
5 Disclosures on January 27, 2014.
- 6 **B. Subjects Of Discovery:** Discovery will be necessary as to the allegations of plaintiff's
7 complaint as well as the substantive and affirmative defenses raised by the
8 defendants. The parties anticipate depositions of the parties and limited depositions
9 as necessary of third party witnesses, within compliance of the guidelines set forth in
10 the Local Rules and the Federal Rules of Civil Procedures.
- 11 **C. Electronically stored information:** The parties do not anticipate any issues with
12 electronically stored information.
- 13 **D. Privilege Issues:** None at this time.
- 14 **E. Changes In Limitations Of Discovery.** The Parties agree to the limitations set forth
15 in the Federal Rules of Civil Procedure.
- 16 **F. Other Orders:** Defendants anticipate requesting a protective order depending upon
17 the scope of the plaintiff's discovery requests.

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20 **5. The Parties' View, Proposals, and Agreements:**

- 21 **A. Prompt Case Resolution:** The parties will work toward a prompt resolution of this
22 matter.
- 23 **B. Alternative Dispute Resolution:** Parties agree that mediation should be used.
- 24 **C. Related Cases:** None.

1 **D. Discovery Management:**

- 2 i. Parties intend to comply with the provisions of FRCP 26(a) and to conduct
3 written discovery as allowed by the Federal Rules of Civil Procedure. All
4 documents provided in discovery will be Bates stamped.
- 5 ii. Plaintiff anticipates propounding written discovery requests and taking
6 depositions of the defendants' company representatives pursuant to FRCP
7 30(b)(6). Defendants anticipate propounding discovery and taking the
8 deposition of the plaintiff and any third parties that may have knowledge
9 regarding alleged liability or damages.

10 **E. Anticipated Discovery Sought:** Plaintiff anticipates propounding written discovery
11 requests and taking depositions of the defendants' company representatives pursuant
12 to FRCP 30(b)(6). Defendants anticipate propounding discovery and taking the
13 deposition of the plaintiff and any third parties that may have knowledge regarding
14 alleged liability or damages.

15 **F. Phasing Motions:**

16 **G. Preservation of Discoverable Information:** All discoverable information has been
17 preserved

18 **H. Privilege Issues:** None

19 **I. Model Protocol for Discovery of ESI:** The parties agree to the use of the Model
20 Protocol.

21 **J. Alternatives to Model Protocol:** None

22 **6. Discovery Completion:** All parties believe that discovery for all aspects of the case can be
23 completed by August 6, 2014.

24 **7. Bifurcation:** Parties do not believe bifurcation is necessary at this time but reserve the
25 right to move for bifurcation.

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- 1 8. **Pretrial Statement:** Parties do not believe pretrial statements should be dispensed with.
- 2 9. **ADR Method and Time:** Parties agree that mediation should be used. Parties agree this
- 3 case would benefit from early ADR and that mediation should not necessarily be
- 4 delayed until after discovery is completed.
- 5 10. **Other Suggestions:** None.
- 6 11. **Trial Readiness.** Parties believe they will be ready for trial by January 2015.
- 7 12. **Jury:** Plaintiff has requested trial by jury.
- 8 13. **Trial Days:** Parties estimate trial will take three to five days.
- 9 14. **Trial Counsel:**

11 **Ahmed Ali**

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15. **Conflicts:** Counsel are not currently aware of any dates that would conflict with the scheduling of trial in this matter.
 16. **Service Of Process Issues:** Not applicable.
 17. **Scheduling Conference:** None requested.
 18. **Disclosure Statements:** Defendant S2 Verify, LLC filed its disclosure statement pursuant to Fed. R. Civ. P. 7.1 and Local Civil Rule 7.1 on January 9, 2014.

Defendant Backgroundchecks.com filed its Corporate Disclosure Statement on January, 9 2014.
 19. **Pilot Program:** The parties agree to participate in the pilot program.

DATED this 27th day of January, 2014.

/s/Christopher Green
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1 DATED this 27th day of January, 2014.

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